

TSD File Inventory Index

Date: October 18, 2001

Initial: CMH/MSD

Facility Name: <u>Chicago International / Chicago Exporting Site (Two Sides Site)</u>			
Facility Identification Number: <u>ILR 000 010 884</u>			
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status	Y	.1 Correspondence	
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	Y	C.1 Compliance - (Inspection Reports)	Y
.3 Part A Application and Amendments	Y	C.2 Compliance/Enforcement	Y
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	Y
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents <u>C-3</u>	1
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence		.4 RFA Reports	
.2 Closure/Post Closure Plans, Certificates, etc		D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 2

.5 RFI QAPP	.7 Lab data, Soil Sampling/Groundwater
.6 RFI QAPP Correspondence	.8 Progress Reports
.7 Lab Data, Soil-Sampling/Groundwater	D.5 Corrective Action/Enforcement
.8 RFI Progress Reports	.1 Administrative Record 3008(h) Order
.9 Interim Measures Correspondence	.2 Other Non-AR Documents
.10 Interim Measures Workplan and Reports	D.6 Environmental Indicator Determinations
D.3 Corrective Action/Remediation Study	.1 Forms/Checklists
.1 CMS Correspondence	E. Boilers and Industrial Furnaces (BIF)
.2 Interim Measures	.1 Correspondence
.3 CMS Workplan	.2 Reports
.4 CMS Draft/Final Report	F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)
.5 Stabilization	G.1 Risk Assessment
.6 CMS Progress Reports	.1 Human/Ecological Assessment
.7 Lab Data, Soil-Sampling/Groundwater	.2 Compliance and Enforcement
D.4 Corrective Action Remediation Implementation	.3 Enforcement Confidential
.1 CMI Correspondence	.4 Ecological - Administrative Record
.2 CMI Workplan	.5 Permitting
.3 CMI Program Reports and Oversight	.6 Corrective Action Remediation Study
.4 CMI Draft/Final Reports	.7 Corrective Action/Remediation Implementation
.5 CMI QAPP	.8 Endangered Species Act
.6 CMI Correspondence	.9 Environmental Justice

Note: Transmittal Letter to Be Included with Reports.

Comments: *Documents do not justify individual folder per schedule C-3. To prevent Confidential data leaks are in separate folder.*

**A.2 Part A/
Interim Status**

Please refer to the instructions for filling Notification before completing this form. The information requested here is required by law (Section 301 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

OCT 06 1995

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☒ A. First Notification ☐ B. Subsequent Notification
(Complete item C)

ILR 000 010 884

II. Name of Installation (include company and specific site name)

C h i c a g o I n t e r n a t i o n a l E x p o r t i n

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

4 0 2 0 S . W e n t w o r t h A v e .

Street (Continued)

City or Town

C h i c a g o

State

Zip Code

I L

6 0 6 0 9 -

County Code

0 3 1

County Name

C o o k

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

4 0 2 0 S . W e n t w o r t h A v e .

City or Town

C h i c a g o

State

Zip Code

I L

6 0 6 0 9 -

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

C o h e n

(First)

S t e v e

Job Title

P r e s i d e n t

Phone Number (Area Code and Number)

3 1 2 - 9 2 4 - 4 0 0 4

VI. Installation Contact Address (See Instructions)

A. Contact Address

Location Mailing Date

☒ ☒

B. Street or P.O. Box

4 0 2 0 S . W e n t w o r t h A v e .

City or Town

C h i c a g o

State

Zip Code

I L

6 0 6 0 9 -

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

S t e v e C o h e n

Street, P.O. Box, or Route Number

4 0 2 0 S . W e n t w o r t h A v e .

City or Town

C h i c a g o

State

Zip Code

I L

6 0 6 0 9 -

Phone Number (Area Code and Number)

3 1 2 - 9 2 4 - 4 0 0 4

B. Land Type

C. Owner Type

P

D. Change of Owner Indicator

Yes

No

X

(Date Changed)

Month

Day

Year

RECEIVED

OCT 02 1995

EPA

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved OMB No. 2030-0028 Expires 9-95
GSA No. 0246-EP

CHICAGO INT. EXPORTS

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes; Refer to Instructions)

A. Hazardous Waste Activity

1. Generator (See Instructions)

- ☒ a. Greater than 1000 kg/mo (2,200 lbs.)
☐ b. 100 to 1000 kg/mo (200-2,200 lbs.)
☐ c. Less than 100 kg/mo (220 lbs.)

2. Transporter (Indicate Mode in boxes 1-5 below)

- ☒ a. For own waste only
☐ b. For commercial purposes

Mode of Transportation

- ☐ 1. Air
☐ 2. Rail
☐ 3. Highway
☐ 4. Water
☐ 5. Other - Specify

3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see Instructions.

4. Hazardous Waste Fuel

- ☐ a. Generator Marketing to Burner
☐ b. Other Marketers
☐ c. Boiler and/or Industrial Furnace

1. Smelter Referral
2. Small Quantity Exemption
Indicate Type of Combustion Device(s)

- ☐ 1. Utility Boiler
☐ 2. Industrial Boiler
☐ 3. Industrial Furnace

5. Underground Injection Control

B. Used Oil Recycling Activity

1. Used Oil Fuel Marketer

- ☐ a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

2. Used Oil Burner - Indicate Type(s) of Combustion Device(s)

- ☐ a. Utility Boiler
☐ b. Industrial Boiler
☐ c. Industrial Furnace

3. Used Oil Transporter - Indicate Type(s) of Activity(ies)

- ☐ a. Transporter
☐ b. Transfer Facility

4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)

- ☐ a. Processor
☐ b. Re-refiner

IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles; See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☐ 2. Corrosive (D002) ☐ 3. Reactive (D003) ☐ 4. Toxicity Characteristic (List specific EPA hazardous waste number(s) for the Toxicity characteristic(s)) ☒ D 0 0 8

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See Instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring a handler to have an ID number; See Instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

[Signature]

Name and Official Title (Type or print)

STEVE CORNER P.E.C.

Date Signed

9-25-95

XI. Comments

Waste is also a PCB - containing waste regulated under 40 CFR Part 761

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)



312-924-4004 (Office)

CHICAGO INTERNATIONAL EXPORTING

4020 So. Wentworth Ave • Chicago, Ill. 60609

Exporters of Scrap Metals

FAX-312-924-4020

TELEX: 206748 Cgo-Int-Ex-Cgo

CABLE CODE: CHGO INLT. EX.

September 21, 1995

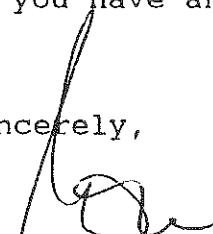
Mr. Jim Pierce
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road #24
Springfield, IL 62706

Dear Sir:

Please find enclosed the USEPA and IEPA applications being generated for a hazardous waste generator ID number. The waste is a characteristic hazardous waste (D008) for TCLP lead. It also contains more than 50 ppm of PCBs, so it is also regulated under 40 CFR Part 761.

If you have any questions, please do not hesitate to call.

Sincerely,


Steve Cohen
President

RECEIVED

OCT 02 1995

IEPA/DLPC

**C.2 Compliance/
Enforcement**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

1995

REPLY TO THE ATTENTION OF

HSE-5J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re:

Dear Sir or Madam:

Enclosed please find a Unilateral Administrative Order issued by the U.S. Environmental Protection Agency ("U.S. EPA") under Section 106 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986 ("CERCLA"), 42 U.S.C. Section 9601, et seq.

Please note that the Order allows an opportunity for a conference if requested within 3 business days after issuance of the Order, or if no conference is requested, an opportunity to submit comments within 7 business days of issuance of the Order.

If you have any questions regarding the Order, feel free to contact Kurt Lindland, Assistant Regional Counsel, at (312) 886-6831 or Steve Faryan, On-Scene Coordinator, at (312) 353-9351.

Sincerely yours,


William E. Muno, Director
Waste Management Division

Enclosure

cc: Mr. Gary King, IEPA Superfund Coordinator



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

IN THE MATTER OF:

Standard Scrap Metal/Chicago
International Exporting
Site
Chicago, Illinois

Respondents:

Chicago International
Exporting,
Steven Cohen,
Lawrence Cohen,
Chicago International
Chicago.

Docket No.

REPLY TO THE ATTENTION OF:

V-W- '95-C-283

ADMINISTRATIVE ORDER
PURSUANT TO SECTION 106(a)
OF THE COMPREHENSIVE
ENVIRONMENTAL RESPONSE,
COMPENSATION, AND
LIABILITY ACT OF 1980,
AS AMENDED, 42 U.S.C.
SECTION 9606(a), AND SECTION
7003 OF THE RESOURCE
CONSERVATION AND RECOVERY
ACT, AS AMENDED,
42 U.S.C. § 6973.

I. JURISDICTION AND GENERAL PROVISIONS

This Order is issued pursuant to the authority vested in the President of the United States by Section 106(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9606(a), and Section 7003(a) of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act ("RCRA"), and further amended by the Hazardous and Solid Waste Amendments of 1984, 42 U.S.C. § 6973, and delegated to the Administrator of the United States Environmental Protection Agency ("U.S. EPA") by Executive Order No. 12580, January 23, 1987, 52 Federal Register 2923, and further delegated to the Regional Administrators by U.S. EPA Delegation Nos. 14-14-A and 14-14-B, and to the Director, Waste Management Division, Region 5, by Regional Delegation Nos. 14-14-A and 14-14-B, and Delegation Number 8-22-C on March 20, 1985.

This Order pertains to property located at 4004 through 4020 South Wentworth Avenue, and 4000 through 4027 South Wells Street (the "Standard Scrap Metal/Chicago International Exporting Site" or the "Site" or the "Facility"). This Order requires the Respondents to conduct removal activities described herein to abate an imminent and substantial endangerment to the public health, welfare or the environment that may be presented by the actual or threatened release of hazardous substances at or from the Site.

U.S. EPA has notified the State of Illinois of this action pursuant to Section 106(a) of CERCLA, 42 U.S.C. § 9606(a), and Section 7003(a) of RCRA, 42 U.S.C. § 6973.

II. PARTIES BOUND

This Order applies to and is binding upon Respondents and Respondents' heirs, receivers, trustees, successors and assigns. Any change in ownership or corporate status of Respondents including, but not limited to, any transfer of assets or real or personal property shall not alter such Respondents' responsibilities under this Order. Respondents are jointly and severally liable for carrying out all activities required by this Order. Compliance or noncompliance by one or more Respondents with any provision of this Order shall not excuse or justify noncompliance by any other Respondent.

Respondents shall ensure that their contractors, subcontractors, and representatives comply with this Order. Respondents shall be responsible for any noncompliance.

III. FINDINGS OF FACT

Based on available information, including the Administrative Record in this matter, U.S. EPA hereby finds that:

1. The Standard Scrap Metal/Chicago International Exporting Site ("SSM/CIE" or "Site") is located at 4004 through 4020 South Wentworth Avenue, and 4000 through 4027 South Wells Street, Chicago, Cook County, Illinois, Latitude 87° 37' 55" north, Longitude 41° 52' 50" west, in a mixed industrial and residential area. The facility is an active 3-acre scrap yard that reclaims copper and other scrap metal from electric motors. Past and present operations have taken place on two distinct parcels of property separated by Wells Street. The east lot is approximately 2.5 acres, and the west lot is approximately .5 acres. The west lot contains the active shredding and metals separation operations, and the east lot contains a scale for weighing incoming and outgoing trucks.

2. The Standard Metal Company ("SMC") was started in 1928 by Sam Cohen and Sam Kanter at 4004 South Wentworth Avenue. SMC was involved in reclaiming scrap metal, including aluminum and copper. The facility contained one gas-fired boiler, two aluminum sweat furnaces, and a wire burning incinerator. Operations continued until 1972 when the company merged into Standard Scrap Metal Company, Incorporated ("SSMCI"). The company went bankrupt in 1987, changed names to Phoenix Recycling, and continued in the metal reclamation business. The Phoenix Recycling business was owned by the Sam Cohen and Sam and Benjamin Kanter Building Partnership.

3. The SCM/CIE Site has been investigated by the Illinois Environmental Protection Agency ("IEPA"), and U.S. EPA beginning in 1973. In 1973, personnel from IEPA inspected the

Site for compliance with air pollution regulations. The inspection revealed that the facility did not have the proper air pollution permits to operate their incinerator or sweat furnaces. A suit (PCB 83-22) was filed against SSMCI for not possessing permits required by IEPA and the City of Chicago. The complaint stated that SSMCI could achieve compliance by installing afterburners on the sweat furnaces. The afterburners were not installed and permits were not applied for until 1984. A permit for the gas-fired boiler was applied for and approved on December 14, 1984.

4. On February 14, 1984, IEPA investigated the Standard Scrap facility, and analytical results indicated levels of polychlorinated biphenyls ("PCBs") up to 1,300 parts per million ("ppm") from the west lot. The IEPA requested that the U.S. EPA conduct a PCB inspection at the Site.

5. On February 14, 1984, IEPA also investigated a report from an employee of a nearby plant that workers at the facility periodically dumped transformer oil on the ground and ignited it. The employee stated that this practice took place from 1977 to 1981. On one occasion, and as a result of these practices, the roof of the Heatbath Corporation caught on fire, and was extinguished by the Chicago Fire Department.

6. On March 30, 1984, U.S. EPA's Toxic Substance Office conducted an inspection of the facility. Analytical results confirmed PCB levels of up to 2,095 ppm, and the facility was fined \$25,000 for violating regulations pertaining to the improper disposal of PCBs.

7. On January 10, 1985, the Illinois Pollution Board ("IPB") continued the suit (PCB 83-22) against SSMCI for permit violations. The IPB suit ordered SSMCI to:

Cease and desist from operations of its incinerator until the necessary operating permit is obtained from the IEPA; cease and desist from operating either of its aluminum sweat furnaces until the necessary permits are obtained from the IEPA, and permanently shut down the inactive aluminum sweat furnace by January 21, 1985.

Install temperature gauges on each afterburner with an interlock that prevents operation unless the afterburner temperature is at least 1400 degrees Fahrenheit, and take all necessary steps to ensure adequate pre-heating of each afterburner prior to charging. These requirements are to be made conditions of the operating permits issued by the IEPA.

Within 90 days of the date of this order pay a penalty of \$30,000 for the violation of the Act and Regulations as described in this opinion.

8. On June 18, 1985, the U.S. EPA Technical Assistance Team ("TAT") contractor, collected four soil samples and two wipe samples from the east lot at the Site. The analytical results indicated PCB levels up to 336 ppm in three samples, and isomers of Dioxin were detected in all four samples. The inspection and data were referred to the U.S. EPA Toxic Substance Control Act ("TSCA") program for enforcement purposes.

9. On October 29, 1985, a complaint was filed by U.S. EPA against SSMCI. The complaint sought a \$30,000 penalty for violations of Section 16(a) of TSCA. In February, 1987, SSMCI appealed the decision and the complaint was dismissed because U.S. EPA could not prove that the PCBs had been accepted at the Site after 1978; however, U.S. EPA appealed the dismissal, the decision was reversed, and the \$30,000 fine was levied against the facility. SSMCI filed for bankruptcy, and the fine was never collected.

10. In 1989 the facility name was changed again to Chicago International Exporting ("CIE"). In the 1980's the facility was expanded to include property located at 4020 South Wentworth, Chicago, Illinois, which is owned and operated by Steven Cohen and Lawrence Cohen and is currently operated by Chicago International Chicago, Inc. The President of both Chicago International Exporting and Chicago International Chicago, Inc., Steve Cohen, and Lawrence Cohen actively manage the metals recycling business under the most recent name of Chicago International Chicago, Inc. The business is still actively reclaiming copper and other scrap from electric motors.

11. In 1990, a former railroad employee had a telephone interview with Tom Crause of IEPA. The former railroad employee indicated that workers at the Standard Scrap facility cut up and disposed of many electrical transformers during his 30 years of employment with the railroad. Based on the previous sampling indicating PCB contamination and this information, on August 27, 1990, the former SSMCI facility was placed on the Comprehensive Environmental Response, Compensation and Liability Information System ("CERCLIS").

12. On August 29, 1991, IEPA personnel conducted an off-site reconnaissance inspection of the facility. IEPA observed piles of scrap metal around the Site. No air emissions were observed at the Site, and the boiler did not appear to be in operation. At the east lot, the north sweat furnace had been demolished, and was left as a pile of debris. A number of drums, which appeared to be empty, were observed near the north side of the office building. No leakage was observed from the drums and no stressed vegetation was observed on the lot. At the west lot, the gates were open and the lot empty with the exception of three semi-trailers. The IEPA prepared

a Preliminary Assessment ("PA") for the Site on September 30, 1991.

13. On September 22, 1992, IEPA was tasked by U.S. EPA Region 5 to conduct a CERCLIS Screening Site Inspection ("SSI") of the Site. After the IEPA had been denied access to the site by the owners twice, the SSI was finally conducted on November 4 and 5, 1992, and consisted of the collection of twelve soil samples. The analytical results from sampling efforts indicated levels of PCBs above the TSCA regulatory level of 50 ppm and high levels of total lead levels above U.S. EPA health risk levels of 400 ppm. Samples collected by IEPA from the Main Yard showed PCB levels of 109 ppm and 60 ppm and samples from the West Yard showed PCB levels of 84 ppm, 547 ppm, 104 ppm and 1430 ppm. Lead levels were detected in ranging from 9,230 ppm to 23,000 ppm in the Main Yard and in the West Yard lead levels ranged from 547 to 1,430 ppm. The IEPA investigators observed the shredding of electric motors and separation of copper at the facility.

Interviews were conducted by IEPA inspector, Mr. Mark Weber, with a neighboring residence at [REDACTED] S. Princeton who stated that material which looked like foil and other small particles which were brittle would cover his yard. The owner of the residence also stated that burying of wire and other debris was common.

14. On February 22, 1994, U.S. EPA performed a removal Site Assessment ("SA") at the Chicago Industrial Exporting Company facility. The facility and buildings were found to be in the same condition as in the previous inspections. The south boundary of the Site is located adjacent to a residential area within a highly populated area on the south side of Chicago, with residences located within 100 feet of the Site. The Site is bounded by railroad tracks on the east and north, and by the Heatbath Corp. on the west.

During the inspection it was confirmed that the shredding of electric motors and reclamation of copper are the primary operations at the Site. The owners and operators of the CIE business, Mr. Lawrence Cohen and Mr. Steven Cohen, were contacted by the U.S. EPA On-Scene Coordinator ("OSC") who requested and was given access to the Site. The facility continues to be split into two yards. The east lot is used to shred the electric motors, and separate the copper, scrap and fluff. The shredded metallic material is also separated from the non-metallic material in the east lot. While the facility claims that a baghouse dust control system will be installed on the shredding operation, which generates extreme amounts of dust during operations, no dust control equipment has been connected to that system to date. Mr. Lawrence Cohen stated that the unit was shut down during the inspection so that the dust would not impact sampling. The metallic material is then